

WILLIAM H. PRUITT, ESQ.
Nevada Bar No. 6783
JOSEPH R. MESERVY, ESQ.
Nevada Bar No. 14088
BARRON & PRUITT, LLP
3890 West Ann Road
North Las Vegas, Nevada 89031
Telephone: (702) 870-3940
Facsimile: (702) 870-3950
E-Mail: bpruitt@lvnvlaw.com
Attorneys for Defendant

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

ELIZABETH POOLE, as Individual Assignee of
Rights of RENE ARGUELLES JR.,

Plaintiff

v.

PROGRESSIVE DIRECT INSURANCE
COMPANY,

Defendant

Case No: 2:24-cv-01981-CDS-BNW

**STIPULATION AND ORDER FOR
EXTENSION OF TIME FOR FILING
OPPOSITION TO DEFENDANT'S
MOTION FOR SUMMARY JUDGMENT**

[ECF No. 26]

Defendant PROGRESSIVE DIRECT INSURANCE COMPANY, and Plaintiff

ELIZABETH POOLE, through their respective counsel, stipulate and agree as follows:

On May 22, 2025, Defendant filed a Motion for Summary Judgment ("Motion") [ECF #25]. Plaintiff's Opposition to the Motion is currently due on June 12, 2025.

Defendant is still in the process of reviewing the complete claims file, preparatory to production of the same. Plaintiff has requested such documents and sufficient time to review the same prior to completing her opposition to Defendant's Motion. As such, the parties have agreed to a 30 day extension for Plaintiff to file her Opposition to the Motion. The new due date for the Opposition will be July 14, 2025.

BARRON & PRUITT, LLP
ATTORNEYS AT LAW
3890 WEST ANN ROAD
NORTH LAS VEGAS, NEVADA 89031
TELEPHONE (702) 870-3940
FACSIMILE (702) 870-3950

1 This Stipulation is submitted in good faith and is not interposed for purposes of delay. This
2 is the first request to extend the deadline for Plaintiff to file an Opposition to Defendant's Motion
3 for Summary Judgment.

4 DATED: June 10, 2025

DATED: June 9, 2025

5 **OHLSON CORNE LLO**

BARRON & PRUITT, LLP

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7 By: /s/Justin A. Corne.
8 JUSTIN A. CORNE, ESQ.
9 Nevada Bar No. 14504
6060 Elton Avenue
10 Las Vegas, Nevada 89107
Attorneys for Plaintiff

By: /s/ William H. Pruitt
WILLIAM H. PRUITT, ESQ.
Nevada Bar No. 6783
3890 West Ann Road
North Las Vegas, Nevada 89031
Attorneys for Defendant

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12 **IT IS SO ORDERED.**

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UNITED STATES DISTRICT JUDGE

16 DATED: June 10, 2025
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